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CCTV Data Protection and GDPR

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GDPR has not affected the CCTV industry hugely, however this basic guide from AS Security is to give you clarity on the requirements. For more information and details regarding your CCTV system please visit the ICO website at <https://ico.org.uk> and search CCTV or click the link below.

<https://icosearch.ico.org.uk/s/search.html?query=CCTV&collection=ico-meta&profile=default>

If you aim to use your CCTV system for Crime Prevention, then the system should be registered with the Information Commissioners Office (ICO). Whether your system is for a private household, a business or covering public spaces. It is the responsibility of the data controller to establish if your system needs to be registered with the ICO, if you are unsure then it is advisable to register your system

If your system is to be installed in domestic residence, then the link below may be of additional use.

<https://www.gov.uk/government/publications/domestic-cctv-using-cctv-systems-on-your-property/domestic-cctv-using-cctv-systems-on-your-property>

Within the ICO website is the section on the CCTV checklist which I have tried to explain in a little more detail below in response to the points from the website.

1.1 Data protection impact assessment

Your business has identified and documented the potential impact on individuals' privacy and taken this into account when installing and operating the CCTV system. You regularly review whether CCTV is still the best security solution.

This basically asks you to think about the need for a CCTV system, what is your requirement for it and how will it impose on an individuals' privacy. (For example, you are a private householder and are attempting to prevent crime by covering your vehicle, or you are a business and are trying to ensure proper procedures are followed to prevent

injury to an employee). This is the reason you are likely to see CCTV signs displayed with "These premises are protected by CCTV for the purpose of crime prevention and public safety".

1.2 Registration

Your business has paid the data protection fee to the Information Commissioner's Office (ICO).

As discussed above, you have registered your system with the ICO.

2.1 Governance

Your business has a policy and/or procedure covering the use of CCTV and has nominated an individual who is responsible for the operation of the CCTV system.

Governance is your documented procedure with regards to the use of the CCTV system, who has responsibility for operating the system. This is to ensure the system is not misused.

2.2 Requests for personal data

Your business has established a process to recognise and respond to individuals or organisations making requests for copies of the images on your CCTV footage and to seek prompt advice from the Information Commissioner where there is uncertainty.

Individuals may ask to be allowed to view footage from your CCTV system for several different reasons and you should have a procedure for this in place. For example, somebody's car has been damaged and they would like to see if your CCTV system has managed to catch the damage being caused, or they approach you and inform you that your CCTV may have caught them appearing to do something "illegal" but they wouldn't and would like to check your footage. In any situation where some individual approaches you requesting to view your CCTV, you should establish which camera they would like to view and a specific date and time frame for the required footage. You may wish to view this footage first before allowing the "individual" to view it, in case the footage covers anything that may breach the privacy of others.

2.3 Training

Your business trains its staff in how to operate the CCTV system and cameras (if applicable) and how to recognise requests for CCTV information/images.

AS Security Alarms Ltd will endeavour to train your nominated individual with the operation of the system, and this individual should then be able to train additional CCTV operators or replacements etc... if the need arises.

3.1 Retention

Your business only retains recorded CCTV images for long enough to allow for any incident to come to light (e.g. for a theft to be noticed) and to investigate it.

With regards to retention of CCTV footage, most businesses would notice vandalism within at least 48 hours of the incident occurring, however theft may be more difficult especially within some larger businesses who only infrequently use some stocked items. Obviously, accidents would normally come to light immediately.

Private household systems may be slightly different, as the CCTV operators may be away on Holiday for 3 or 4 weeks etc... and so theft or vandalism may not be noticed until the homeowner returns, AS Security Alarms Ltd therefore aim for the CCTV systems to retain the footage for between 2 – 4 weeks unless a specific reason is required for longer retention time. This time may vary as most CCTV systems will change image quality and/or frame rates when motion is sensed.

3.2 Data quality

Your business has ensured that the CCTV images are clear and of a high quality.

Ensuring your recorded footage is of a clear quality is much easier with IP systems than the older analogue systems. Your cameras will periodically require cleaning to ensure the best possible image is still recorded. The newer IP systems tend to have fixed lenses and so will not need refocusing as some of the older analogue cameras would. Some of the analogue cameras may also have signal loss due to cable degradation or joints, whereas the newer digital systems should either have a good quality picture or no picture at all. If you feel that your pictures are losing some clarity, then you should contact a CCTV company to rectify the problem.

3.3 Data security

Your business securely stores CCTV images, limits access to authorised individuals and regularly checks that the CCTV system is working properly.

Your CCTV recording unit should be in a secure position. Obviously in most houses, if the system is within the house it is secure. However, in a business the system should be either in an office with limited access or in a secure cabinet to ensure unauthorised access. Within some businesses the CCTV is in an area accessible by all, however if a trained CCTV operator within the locality this can be classed as secure. All CCTV recording units should also have password protection again to prevent unauthorised access.

4.1 Fair processing

Your business clearly informs individuals of your use of CCTV.

As stated near the beginning of this guide you are likely to have seen some CCTV signage, and if the signs are positioned near the entry points to your premises and can be seen during entry you have informed individuals on the use of CCTV.

Domestic CCTV systems do not need to display signs however, the ICO suggests informing your neighbours of the installation of your CCTV if no signs are displayed, this ensures you have met the requirements.